



# **EXHIBIT 17**

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

SUPER INTERCONNECT )  
TECHNOLOGIES LLC, )  
Plaintiff, )  
v. )  
HUAWEI DEVICE CO. LTD., ) Civil Action No.  
ET AL ) 2:18-cv-00462-JRG  
\_\_\_\_\_) \_\_\_\_\_  
GOOGLE LLC, ) Civil Action No.  
Defendants. ) 2:18-cv-00463-JRG

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ORAL AND VIDEOTAPED DEPOSITION OF  
HOLLY HERNANDEZ

AS 30(b)(6) FOR SUPER INTERCONNECT TECHNOLOGIES LLC  
DECEMBER 19, 2019

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1 A. Well, like I said, some months it's more than 09:25:28  
2 others. [REDACTED] 09:25:31  
3 [REDACTED]. 09:25:34  
4 [REDACTED] 09:25:37  
5 [REDACTED]. 09:25:40  
6 Q. [REDACTED]. Correct? 09:25:41  
7 A. [REDACTED] 09:25:44  
8 Q. Frisco. So Acacia has an offense at Frisco 09:25:45  
9 then? 09:25:52  
10 A. Yes. 09:25:52  
11 [REDACTED] 09:25:52  
12 A. No. 09:25:56  
13 Q. [REDACTED] 09:25:56  
14 [REDACTED] 09:25:59  
15 A. [REDACTED]. 09:25:59  
16 Q. SIT's located in Austin. Is that right? 09:26:01  
17 A. I don't believe it's located in Austin. 09:26:06  
18 Q. Where do you believe it's located? 09:26:11  
19 A. I believe the address is 6136 Frisco Square, 09:26:12  
20 but I don't know for sure. 09:26:18  
21 Q. [REDACTED] 09:26:20  
22 [REDACTED] 09:26:25  
23 A. [REDACTED] 09:26:27  
24 Q. And that's also an Acacia address. Correct? 09:26:27  
25 A. Correct. 09:26:30

1 Q. Does SIT have any other addresses beyond the 09:26:30  
2 Frisco address you identified? 09:26:38  
3 A. No. 09:26:39  
4 Q. So I would like to move on to another set of 09:26:40  
5 topics. 09:27:07  
6 So you mentioned before SIT is a subsidiary of 09:27:16  
7 Acacia. Correct? 09:27:18  
8 A. Correct. 09:27:19  
9 Q. So I have some questions about Acacia. So how 09:27:20  
10 would you describe Acacia's business? 09:27:24  
11 A. Acacia is in the business of assisting 09:27:26  
12 patentholders with monetizing their patent portfolios. 09:27:32  
13 Q. And how does it do that? 09:27:35  
14 A. It does it in various ways. I would say 09:27:37  
15 mostly through licensing efforts. 09:27:42  
16 Q. How many employees does Acacia have today? 09:27:43  
17 A. [REDACTED]. 09:27:53  
18 Q. [REDACTED] 09:28:00  
19 [REDACTED]? 09:28:04  
20 A. Correct. 09:28:05  
21 Q. Where are these employees located? 09:28:06  
22 A. [REDACTED] [REDACTED]  
[REDACTED] [REDACTED] [REDACTED]  
[REDACTED] [REDACTED] 09:28:18  
25 Q. [REDACTED] [REDACTED] 09:28:19

1 have any type of formal title or role with SIT? 09:44:25

2 A. No. 09:44:28

3 Q. Does SIT have any -- strike that. 09:44:29

4 [REDACTED] 09:44:34

5 [REDACTED] 09:44:37

6 [REDACTED] 09:44:40

7 A. Not that I'm aware of. 09:44:43

8 Q. The four people you named, yourself -- well, 09:44:44

9 you're an attorney, but so the other [REDACTED] 09:44:51

10 [REDACTED] are they all attorneys? 09:44:55

11 A. No. 09:45:01

12 Q. Is Marc Booth an attorney? 09:45:01

13 A. No. 09:45:01

14 Q. Is Eric Lucas an attorney? 09:45:01

15 A. Yes. 09:45:01

16 Q. Is Li Yu an attorney? 09:45:03

17 A. No. 09:45:05

18 Q. Where are Mr. Booth, Lucas and Yu located? 09:45:06

19 A. They're located in Irvine. 09:45:14

20 Q. And we mentioned before SIT's located, to your 09:45:15

21 knowledge, in Frisco. Correct? 09:45:23

22 A. Correct. 09:45:24

23 Q. [REDACTED] 09:45:24

24 [REDACTED] 09:45:39

25 [REDACTED] [REDACTED] 09:45:43

1 A. We are employed by Acacia Research Group. 09:45:45

2 Q. [REDACTED] 09:45:48

3 [REDACTED] [REDACTED] 09:45:51

4 A. [REDACTED] 09:45:52

5 Q. Why did SIT choose to form in Frisco in Texas? 09:45:52

6 MR. KIMBLE: Hold on a second. Caution 09:46:10

7 the witness not to reveal any attorney/client privileged 09:46:12

8 information or any work product information. 09:46:15

9 A. Right. Well, Acacia Research Group's 09:46:21

10 headquarters are in Frisco, Texas, and SIT is a 09:46:25

11 subsidiary of Acacia Research Group. So it made sense 09:46:29

12 to incorporate in Texas. Or form in Texas. It's not a 09:46:33

13 corporation. 09:46:36

14 Q. (BY MR. LIANG) Are Acacia Research Group's 09:46:39

15 other subsidiaries also based out of that same address 09:46:42

16 in Frisco, Texas? 09:46:45

17 A. I would say the vast majority of them are 09:46:46

18 based out of Frisco, Texas. 09:46:49

19 Q. How many subsidiaries is that, roughly? 09:46:51

20 A. Well, I mentioned there's approximately 100 09:46:52

21 subsidiaries. I would say 80 to 95 percent of them are 09:46:55

22 located in Frisco, Texas, but that's just a guess. 09:47:00

23 Q. So SIT is located in Frisco, Texas, but [REDACTED] 09:47:07

24 [REDACTED] are in Irvine, California. Is 09:47:12

25 that correct? 09:47:15

1 Correct? 11:42:44

2 MR. KIMBLE: Object to the form, also 11:42:44

3 beyond the scope. 11:42:47

4 A. I am not aware of any. 11:42:48

5 Q. (BY MR. LIANG) So just probably the last 11:42:50

6 question. So you said SIT is based in Frisco, Texas. 11:42:57

7 Correct? 11:43:05

8 A. Correct. 11:43:05

9 Q. So if the complaint in this case said it was 11:43:05

10 based in another location, the complaint would be wrong? 11:43:10

11 A. I believe so. 11:43:13

12 Q. And SIT was never based anywhere else other 11:43:15

13 than Frisco. Correct? 11:43:25

14 A. I believe so. 11:43:26

15 MR. LIANG: All right. Give me a couple 11:43:35

16 minutes off the record, and I'll just see if we have 11:43:37

17 anything else and I'll be done. 11:43:39

18 Do you expect to have a redirect or -- 11:43:42

19 MR. KIMBLE: One question. 11:43:43

20 MR. LIANG: Okay. 11:43:44

21 THE VIDEOGRAPHER: We're going off the 11:43:45

22 record at 11:44 a.m. 11:43:46

23 (Break from 11:44 a.m. to 11:54 a.m.) 11:44:11

24 THE VIDEOGRAPHER: We are going back on 11:54:26

25 the record at 11:55 a.m. 11:54:28